

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Squared Funding Cali LLC

Plaintiff(s),

-against-

Henderson et al.

**JOINT PROPOSED
CIVIL CASE MANAGEMENT PLAN**

24 Civ. 454 (DLI) (VMS)

Defendant(s).

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The parties/counsel who conferred in drafting this joint proposed case management plan:

For Plaintiff(s): Steven William Wells

For Defendant(s): David Michael Kassel

- A. Do the parties request referral to the Court's ADR program? Yes: No:
- B. Do the parties consent to proceed before a Magistrate Judge pursuant to **28 U.S.C. § 636(c)**?
Yes: If yes, fill out the AO 85 Notice, Consent and Reference of a Civil Action to a Magistrate Judge Form and file it on ECF. <https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge>.
No: If no, do not indicate which party declines consent.
- C. The parties may wish to engage in settlement discussions.
If so, Plaintiff(s) will serve demand by July 1, 2024 . Defendant(s) will respond by July 8, 2024 .
- D. Defendant(s) will answer or otherwise respond to complaint by March 8, 2024 , if not yet done.

The parties will serve Rule 26(a)(1) initial disclosures by July 2, 2024 , if not yet done.

The parties will serve initial document requests and interrogatories on or before July 9, 2024 .

Any joinder and/or amendments of the pleadings must be made by July 9, 2024 .

The parties will complete fact discovery by November 4, 2024.

If the parties perform expert discovery, they will serve initial disclosures by November 18, 2024; initial expert reports by December 2, 2024; and rebuttal expert reports on or before December 16, 2024 . All discovery, including expert depositions, will be completed by December 30, 2024, and the parties will file a joint letter certifying the close of all discovery by this same date.

Other considerations the parties wish to bring to the Court's attention, such as the need for electronic discovery or confidentiality order: